

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MERLE NICHOLS, on behalf of himself and  
All others similarly situated,

Plaintiff,

v.

GEICO GENERAL INSURANCE  
COMPANY, a foreign automobile insurance  
Company,

Defendant.

Case No. C18-1253-TL-SKV

**STIPULATED MOTION AND  
(~~PROPOSED~~) ORDER TO EXTEND  
CASE DEADLINES**

**I. STIPULATED MOTION**

Pursuant to Federal Rule of Civil Procedure 6(b) and LCR 7(d)(1), Defendant GEICO GENERAL INSURANCE COMPANY, a foreign automobile insurance company (“Defendant”), and Plaintiff MERLE NICHOLS, on behalf of himself and the *Nichols* Class (“Plaintiff”) (collectively, “the Parties”), hereby stipulate to and jointly request an extension of the Court’s deadline to conduct a mediation.

In support of this stipulation, the Parties state as follows:

1. In its Order Striking Case Schedule and Trial Date entered on August 8, 2024 (Dkt.

STIPULATED MOTION AND (~~PROPOSED~~)  
ORDER TO EXTEND CASE DEADLINES - 1  
Case No. C18-1253-TL-SKV

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1 #195), the Court provided the Parties one hundred (100) days to conduct mediation.

2         2.       The Parties scheduled mediation with Judge Chad Allred (ret.) for November 12,  
3 2024. In preparation for that mediation date, the Parties completed various disclosures to  
4 facilitate constructive and candid negotiations. However, due to unforeseen scheduling and  
5 travel difficulties associated with obligations in unrelated cases for GEICO's counsel, the Parties  
6 agreed to re-schedule the mediation.  
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8         3.       Given the upcoming holidays and the travel required for GEICO's counsel to  
9 attend in-person, the Parties have reset the mediation to January 7, 2025. This is outside the  
10 period prescribed in the Court's Order, and thus, the Parties hereby request an additional sixty  
11 (60) days to conduct mediation, with a deadline of January 15, 2025.  
12

13         4.       The requested extension is modest and will allow the Parties to explore resolution  
14 and/or constructively narrow the issues in dispute. Thus, regardless of the mediation's outcome,  
15 it will serve the interests of judicial economy.

16         5.       The Parties jointly seek the opportunity to conduct a thorough and meaningful  
17 mediation on January 7, 2025, and believe good cause justifies the resulting minimal delay.

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DATED this 20th day of November, 2024.

/s/ Mark A. Trivett

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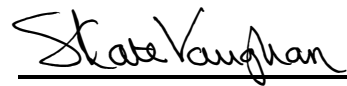
*Attorneys for Defendant*

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**II. SUBJOINED ORDER**

THE COURT, having considered the Parties' Stipulated Motion to Extend Case Deadlines, and being fully advised, ORDERS that the Parties are provided sixty (60) additional days to conduct mediation, with a new deadline of January 15, 2025. The Parties shall prepare and file a joint status report within thirty (30) days of mediation advising the Court of its outcome. If the Parties do not, for whatever reason, reach a resolution, they will propose a new case schedule and trial date in the aforementioned joint status report.

Dated this 22nd day of November, 2024.



S. KATE VAUGHAN  
United States Magistrate Judge